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July 12, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

*Re: In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Lowell Telecommunications Corporation (LTC) submits this letter in the above-referenced rulemaking proceeding (NPRM).

LTC is a non-profit organization which operates two public (one with English language programming, the other featuring foreign language programming in Portuguese, Spanish and Khmer) and one government access station in Lowell, Massachusetts. We are also a community media center, offering training, technical assistance and equipment for media makers. In 2012 nearly 7,000 people visited our center. We produced 11,000 programs which equals over 20,000 hours of locally generated programming. Our programming is available to 30,000 subscribers in Lowell, Massachusetts.

We carry over 50 programs in our government access channel. By the end of 2014, 1 will be closed captioned. This is the City Council Meeting, which runs between 1-5 hours on a weekly basis during the school year, and every other week during the summer. The call for this service, as well as the funding for providing it is furnished to us via the Disability Commission of Lowell. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast Cable, does not provide a label or symbol indicating that this program has closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast Cable currently writes "government programming" in the channel guide for this channel. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). We have recently completed our ascertainment period with Comcast Cable, and requested that they carry our full program listings on their program guide. They have not given us a response as of yet. We expect to have a final response by October of 2013. Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning



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and video description).

Thank you for the opportunity to submit these comments.

FCCSincerely,

A handwritten signature in blue ink, appearing to read 'Jessica K. Wilson'.

**Jessica K. Wilson**  
**Executive Director**  
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